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January 20, 2006

Ms. Selica Potter  
Acting Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

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District Manager

Mary K. Snyder  
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Plant Manager

Dear Ms. Potter:

Sacramento Regional County Sanitation District (SRCSD) appreciates the opportunity to submit comments in response to the State Water Resources Control Board's (SWRCB) Notice of Public Workshop for Salinity Issues in the Central Valley. SRCSD, as a member of the Central Valley Clean Water Association (CVCWA) concurs with the comments CVCWA has provided SWRCB on this issue. In addition, the following comments are submitted for your consideration.

**Objectives of Workshop**

1. It would be helpful for the SWRCB to clarify how this workshop and the feedback provided in this workshop will be coordinated with the TMDL for salinity on the lower San Joaquin River as well as the work underway on the Central Valley Drinking Water Policy.

**Relative Importance of Sources of Salinity**

2. While it is fair to discuss the Sacramento River's dilution function in the Delta, it is not impaired for salt. The relative importance of the dilution effects compared to the actual sources and potential source reductions in the Tulare and San Joaquin River Basins should be considered. It is likewise important to state the relative contribution of each of the sources of salinity and consider them in the order of highest to the lowest contributor. Since the SWRCB, through CVRWQCB, manages impacts to groundwater, and given that groundwater contributes to the salinity in surface water, it would seem prudent for SWRCB and the regional boards to also reconcile the relative importance of groundwater's contribution to surface water salinity (relative to other sources) and provide appropriate guidance for whatever state agency is taking responsibility for managing the groundwater resource.
3. Given export, storage, delivery, and use are the activities that most affect salinity in the Central Valley, effective salinity control would indicate focusing initial reduction efforts and responsibility on those who export, store, deliver, and use that water.

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4. Mercury concentrations in fish, like salt, also change very slowly and improvements are difficult to measure and quantify. TMDL implementation plans need to recognize this fact.

Clarification

Section 6

5. Clarify if you intend to reference production of biosolids, which would be duplicative with municipal wastewater treatment plants, or application of biosolids, which is already regulated.
6. Recent Central Valley Regional Water Quality Control Board staff definition of beneficial uses of water bodies in the Central Valley and interpretation of the anti-degradation policy would indicate that the threat to surface waters from salinity is not dependent on the characteristics of the waste but rather that every molecule of salt counts. At recent CVRWQCB hearings on the Ag waiver, staff have defined every otherwise undesignated water body in the Central Valley as having the potential beneficial use of municipal drinking water, which carries with it the strictest water quality standards. The CVRWQCB staff further stated at that hearing that it was too onerous a job to perform use attainability analysis on all of these waterways. This strict definition of beneficial uses of water bodies coupled with the CVRWQCB staff strict interpretation of the anti-degradation policy, would indicate a much stricter definition of a threat to the surface water that is not at all dependent on characteristics of the waste, as is implied in Section 6.
7. Clearly define, in specific numeric terms, what is meant by a "hotspot".

Please feel free to contact Vicki Fry at (916) 876-6113 if you have any questions or wish to discuss our concerns in more detail.

Sincerely,



Wendell H. Kido  
District Manager